

# **EXHIBIT K**

1 document that in the computer.  
 2 **Q All right. So you might take notes while**  
 3 **you're meeting with a patient?**  
 4 A (Indicating.)  
 5 **Q And then when do you enter it into a**  
 6 **computer?**  
 7 A I'd say the majority of the time it's  
 8 either right after if I can, if I have time, or at  
 9 lunch if I can. If it's at the end of the day, it  
 10 would probably be the next morning. I'd show up at  
 11 least an hour early to do the afternoon notes in the  
 12 morning, the following morning. But there are  
 13 occasions where I catch up a good day or two later on  
 14 the weekends.  
 15 **Q It doesn't sound like you're a person who**  
 16 **dictates?**  
 17 A No, I don't dictate.  
 18 **Q So you, yourself, are the one who enters**  
 19 **it --**  
 20 A Yeah.  
 21 **Q -- into a computer?**  
 22 A Yes.  
 23 **Q And do you make a notation when you enter**  
 24 **it into the computer as to the time you entered it**  
 25 **relative to the time the information was taken?**

1 A No.  
 2 **Q So, for example, in old school medical**  
 3 **records where it might say dictated on a later date,**  
 4 **your system doesn't reflect that?**  
 5 A I have to go in -- there might be a thing  
 6 that says when it was signed.  
 7 **Q So there was a provision for an electronic**  
 8 **signature?**  
 9 A Yeah, I mean, I electronically sign all  
 10 the notes. So that might say the time. I guess I  
 11 look at it.  
 12 **Q And what is the purpose in your mind of**  
 13 **keeping good records of your patient visits?**  
 14 A One, so that I or somebody else can see  
 15 what happened at the visit to see what happened and  
 16 get an idea of what happened in the past and what to  
 17 do going forward.  
 18 **Q Fair to say it's important for purposes of**  
 19 **future treatment of that patient, correct?**  
 20 A Yes.  
 21 **Q For example, medications need to be well**  
 22 **documented?**  
 23 A Yes.  
 24 **Q And complaints of symptoms would be**  
 25 **documented?**

1 A Um-hum, yes.  
 2 I would say that the majority of the notes  
 3 get done immediately because the medical assistant is  
 4 writing down in the, oh, the HPI section why they're  
 5 there. And the assessments, I do everything  
 6 electronic. I put all the orders in. I put all the  
 7 labs in, medications, and I make sure that the  
 8 assessment plan is laid out that -- that day so that  
 9 if I do get behind, I have to do it later or a couple  
 10 days later on the weekend.  
 11 Basically it's just clicking a button, but  
 12 all of the pertinent information is already filled  
 13 out in the assessment plan.  
 14 **Q Okay.**  
 15 A So it's mostly done. I would say if  
 16 they're not done, they're 70 percent complete and I  
 17 just -- there's a lot of radial buttons for us to  
 18 click to complete the medical record.  
 19 **Q Okay. And I presume during the course of**  
 20 **your work as a resident and then at Saint Thomas**  
 21 **More, you strive to keep accurate records in your**  
 22 **practice?**  
 23 A Yes.  
 24 **Q You've been trained to do that?**  
 25 A Yes.

1 **Q All right. Do you know how you came to be**  
 2 **the doctor for Virginia Giuffre?**  
 3 A No. I -- she would have filled out a new  
 4 patient packet and showed up for a new patient  
 5 appointment for a particular reason. I reviewed it.  
 6 It was essentially getting refill of medications and,  
 7 you know, to address her problems.  
 8 **Q Do you know where that new patient packet**  
 9 **is now?**  
 10 A It's going to be scanned in the computer.  
 11 If you don't have it, I brought my computer. I can  
 12 probably scan it and print it out or just print it  
 13 out.  
 14 **Q Is that among the documents that you have**  
 15 **next to you?**  
 16 A The new patient packet isn't here, but I  
 17 have it -- I should have it on my computer. I could  
 18 probably log in and print it, to be honest. It  
 19 wouldn't be that hard. I assumed that the hospital  
 20 is taking care of all the documentation that was  
 21 requested. So I didn't actually bring it.  
 22 **Q I understand.**  
 23 A I actually have it, happen to have it with  
 24 me.  
 25 **Q All right. Why don't we -- we can**